

FOR THE DISTRICT OF DELAWARE

CORPORAL TRINIDAD NAVARRO,

Plaintiff,

V.

CHRISTOPHER A. COONS,  
individually and in his official capacity;  
GUY H. SAPP, individually and in his  
official capacity; and NEW CASTLE  
COUNTY, a municipal corporation,

Defendants.

C.A. No. 05-565 GMS

## JURY TRIAL DEMANDED

## STIPULATION FOR EXTENSION OF TIME

According to the Court's December 8, 2005 Scheduling Order (D.I. 14), fact discovery is to end on May 1, 2006, expert reports are due on May 31 and June 30, 2006, with expert discovery concluding August 14, 2006; and case dispositive motions are to be filed on or before May 15, 2006.

Counsel have been working diligently to conduct discovery in this matter. Voluminous documents have been produced and production is ongoing. Depositions have been taken and more are scheduled. However, due to the trial schedules of counsel, the need for supplemental personnel to address document production requests, and the need to depose numerous government officials and witnesses, counsel will be unable to meet the above deadlines and respectfully request that these deadlines be extended.

IT IS HEREBY STIPULATED AND AGREED, by and between counsel, that the above deadlines be extended as follows: the fact discovery deadline will be extended to July 1, 2006, expert discovery shall be extended to July 31, 2006 (Plaintiff) and August 31, 2006 (Defendant), the completion of expert discovery shall be extended to September 14, 2006, and the case dispositive motion deadline shall be extended to July 17, 2006.

Dated: April 11, 2006

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IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2006.

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THE HONORABLE GREGORY M. SLEET